From: "Burgess, Chaning LCDR" < Chaning.D.Burgess@uscg.mil >

Date: 01 February, 2011 07:53:14 EST

To: "Rich Wigger" < rwigger@colonialmarine.com >, "James H. Sanborn"

<iameshsanborn@comcast.net> Cc: "Moon, Youngmee LCDR"

< Youngmee. Moon@uscg.mil >, "OConnell, David LCDR" < David. E.OConnell@uscg.mil >, "Olsen, Kenneth"

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Subject: Results on recent USCG MARPOL exam of IONIA's THEO T

FYI

----Original Message----From: Mercurio, Chris LT

Sent: Monday, January 31, 2011 4:26 PM To: Sturgis, Linda CDR; Hillin, John

2/8/2011

Cc: Hahn, John LCDR; Ramos, John ENS; Hanson, Eric LT; Isralsky, Barry MSSD4;

Payne, Grant MST3

Subject: Theo T - narrative

Mr. Hillin, CDR Sturgis,

CWO Isralsky, ENS Ramos, MST3 Payne and I attended the Theo T to conduct an expanded MARPOL I exam. Below is the narrative.

V/r Chris

30-Jan-2011

Vessel designated as Priority I for Safety/ MARPOL examination. COTP order issued requiring vessel to anchor in Gravesend Bay for USCG inspection prior to being allowed port entry. Inspection pends.

31-Jan-2011

Boarded vessel at Gravesend Bay to conduct PI expanded MARPOL Annex I examination of vessel. Met with vessel Master and discussed scope of exam. Reviewed Oil Record Book, Seal Record book Oil Content Meter calibration certificate, OWS and Incinerator operating manuals. Examined operating instructions, testing procedures and daily reporting instructions.

Met with Chief Engineer to discuss scope of exam. Verified all seals on OWS and associated piping system were in place & seal numbers were entered into vessel seal record book. OWS shows no signs of tampering. Tested the OCM and automatic stopping device (3-way valve) in accordance with manufacturer's instructions. Traced out OWS piping system from skin valve to OWS and from OWS back to bilge holding tank. Seals intact, all flanges in place, all piping conforms to approved schematics. Examined piping runs in lower engine room, no apparent signs of additional connections, multiple seals placed on independent piping systems. NO signs of tampering evident on any piping installations. All manhole covers to tanks in engine room secured, no signs of recent entry.

Witnessed manual sounding of 3 tanks (Separated Bilge Oil Tank, Bilge Holding tank, Purifier Sludge Tank) and verified tank levels matched levels from morning soundings as well as installed radar tank gauging levels. 1 discrepancy noted - the radar gauge for the bilge oil tank was in default mode reading tank was full. Replacement part already on order & discrepancy was entered into vessels maintenance system.

Sludge incinerator main burner assembly reported as damaged by C/E vessel unable to run continuously, vessel has not been burning sludge. Parts are on order, delivery expected in this port. Vessel has been trading in heavy fuel oil & crude oil, sludge has been mixed with cargo and discharged. Entries in Oil Record book confirm this. Confirmed the vessel's bilge and sludge tank capacities were adequate for their intended voyage.

Completed remainder of PI safety exam & ISPS III exam using CG-840 book as

guide. Witnessed satisfactory fire & abandon ship drills. Issued 03 deficiencies, cleared 01 and 02 remain outstanding. Issued deficiencies are unrelated to MARPOL Annex I compliance systems. Inspection complete.

//s//

LT C. Mercurio